

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x UNITED STATES OF AMERICA :

-v.- : WILLIAM MOORE,  
a/k/a "Willie Moore,"  
Defendant.

07 CRIM 1060

INFORMATION

07 Cr.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: NOV 21 2007  
DATE FILED:

----- x COUNT ONE

The United States Attorney charges:

1. From in or about 2004, up to and including in or about September 2007, in the Southern District of New York and elsewhere, WILLIAM MOORE, a/k/a "Willie Moore," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that WILLIAM MOORE, a/k/a "Willie Moore," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, one hundred kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

COUNT TWO

3. In or about September 2007, in the Southern District of New York, WILLIAM MOORE, a/k/a "Willie Moore," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Information, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a .357 caliber handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

4. As a result of committing the controlled substance offense alleged in Count One of this Information, WILLIAM MOORE, a/k/a "Willie Moore," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds MOORE obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count One of this Information.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)

  
MICHAEL J. GARCIA  
United States Attorney